

FILED

JAN 30 2024

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

"JENNY", "JANE", "FIONA", "ERIN",)
"AMY", "JESSICA", "ANNA",)
"TAYLOR", "LILY", "SARAH",)
"HENLEY", "JANE DOE" as conservator for)
"SAVANNAH" a protected person, and for "SKYLAR")
a minor, "JOHN DOE" as conservator for "SALLY",)
"MAUREEN", "VIOLET", "PIA", and)
"MYA",)
Plaintiffs,)
v.)
JEFFREY RAHN REETZ,)
Defendant.)

Case No. 23-cv-474-SH

DEFENDANTS' OPENING BRIEF IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS

I. STATEMENT OF DEFENDANT

I JEFFREY RAHN REETZ DO STATE THAT I HAVE NEVER VIEWED OR DOWNLOADED ANY CHILD PORNOGRAPHY. I ABHOR CHILD PORNOGRAPHY AND FIND THE IDEA OF IT ABERRANT AND DISGUSTING. I AM NOT FAMILIAR WITH ANY OF THE PSEUDONYMS AND OR THE INDIVIDUALS ASSOCIATED WITH THE PLAINTIFFS ACTION. I HAVE NEVER SEEN OR VIEWED IMAGES OF ANY OF THESE INDIVIDUALS AS MINORS OR ADULTS, THEREFORE THEY HAVE NO NEED TO FEAR ANY HARASSMENT, INSURY, RIDICULE, OR PERSONAL EMBARRASSMENT FROM ME. THIS BEING SAID, I AM SYMPATHIC TO THE PLAINTIFFS REQUEST FOR REMAINING ANONYMOUS, AS LONG AS IT DOES NOT EFFECT MY ABILITY TO DISCOVER CERTAIN FACTS ALLOWING ME TO MOUNT A REASONABLE DEFENSE.

UNDERSTANDING THE SENSITIVITY OF THE PLAINTIFFS AND BEING VERY SYMPATHETIC TO THEIR HORRIBLE PAST AND EXPERIENCE, I JEFFREY RAHN REETZ AM WILLING TO STIPULATE TO THE PLAINTIFFS USE OF PSEUDONYMS.

II. FACTS RELEVANT TO MOTION

I JEFFREY RAHN REETZ BEING TOTALLY UNFAMILIAR WITH THE PLAINTIFFS AND HAVING NEVER DOWNLOADED OR VIEWED IMAGES OF CHILD PORNOGRAPHY, IT IS INEXPLICABLE THAT I COULD HAVE CAUSED ANY HARM OR DAMAGES TO THE PLAINTIFFS. I HAVE BEEN TOLD BY MY COMPUTER FORENSIC EXPERT THAT IMAGES OF THE PSEUDONYM PLAINTIFFS ARE WIDELY DISTRIBUTED AND READILY AVAILBLE ON THE INTERNET, HOWEVER I AM NOT AWARE OF THEM NOR HAVE I EVER VIEWED ANY IMAGES ASSOCIATED WITH THEM, I JEFFREY RAHN REETZ DID IN FACT TAKE A PLEA DEAL, CHARACTERIZED BY JUDGE FRIZZELL AS A "SWEET HEART DEAL" FOR POSSESSION OF CHILD PORNOGRAPHY. I TOOK THIS PLEA DEAL FOR A NUMBER OF EXTRANEIOUS REASONS. HOWEVER MY COMPUTER FORENSIC EXPERT WAS ABLE TO ASCERTAIN THAT CHILD PORNOGRAPHY WAS IN FACT PRESENT ON THE HARD DRIVE OF ONE OF MY COMPUTERS, ERGO POSSESSION. HOWEVER I WAS TOTALLY UNAWARE OF THE PORNOGRAPHY ON MY HARD DRIVE AS I HAD NEVER SEEN IT OR DOWNLOADED IT. IN FACT MY COMPUTERS WERE NEVER WITH IN MY SOLE POSSESSION AND CONTROL, I HAD GIVEN THE COMPUTER ROUTINELY TO MY EXWIFE AND OTHERS. I AM NOT VERY COMPUTER LITERATE AND NEVER HAD ANY PASSWORD PROTECTION, MY FORENSIC EXPERT EXPLAINED TO ME THAT OVER 90% OF THE CP ON THE HARD DRIVE WAS

IN UNALLOCATED FILES, WHICH HE EXPLAINED THIS MEANS THEY WERE SIMPLY DOWNLOADED AND NEVER VIEWED, BASICALLY JUST "PUT ON THE HARD DRIVE". THIS TYPE OF DOWNLOAD IS IN FACT TYPICAL OF SOMEONE WITH PURPOSEFUL INTENT TO SIMPLY PLANT EVIDENCE.

III ARGUMENT

THE PLAINTIFFS ARE IN FACT COMPLETE AND UTTER STRANGERS TO JEFFREY RAHN REETZ. THE PLAINTIFFS CHILD PORNOGRAPHY AND SEX ABUSE IMAGES HAVE NEVER BEEN VIEWED BY JEFFREY RAHN REETZ NOR WERE THEY DOWNLOADED BY HIM. JEFFREY RAHN REETZ IN FACT HAD NO KNOWLEDGE OF ANY IMAGES OF THE PLAINTIFFS ON THE HARD DRIVE. JEFFREY RAHN REETZ NEVER ACCESSED THE INTERNET TO VIEW ANY IMAGES OF THE PLAINTIFFS OR ANY CHILD PORNOGRAPHY. IN FACT, HIS EXWIFE WHO HAD COMPLETE ACCESS AND CONTROL OF HIS COMPUTERS DID MALICIOUSLY DOWNLOAD CP ON THE HARD DRIVE WITHOUT HIS KNOWLEDGE. JEFFREY RAHN REETZ AND HIS WIFE DANIELLE MORRIS REETZ DIVORCED DUE TO DANIELLE'S DRUG ADDICTION AND UNLAWFUL ACTIVITIES. DANIELLE ROUTINELY TOLD FRIENDS AND FAMILY THAT SHE WAS GOING TO PUT JEFFREY RAHN REETZ IN PRISON OR KILL HIM. DANIELLE DID IN FACT GO TO JEFFREY RAHN REETZ'S HOME TO KILL HIM AND WAS ARRESTED FOR HER THREATS AND DAMAGE TO PROPERTY. UNFORTUNATELY, DURING THE INVESTIGATION ON ME THE FEDERAL AUTHORITIES AND MY LEGAL TEAM COULD NOT LOCATE DANIELLE. DURING MY INCARCERATION I HAD HOPED TO GET OUT AND REASON WITH DANIELLE TO TELL THE AUTHORITIES THE TRUTH, THAT

SHE HAD IN FACT DOWNLOADED CP ON THE COMPUTER WITHOUT MY KNOWLEDGE. UNFORTUNATELY, JUST A COUPLE OF MONTHS BEFORE MY RELEASE DANIELE TOOK HER OWN LIFE BY HANGING. DANIELE WAS OBVIOUSLY VERY TROUBLED AND GUILT RIDDEN. JEFFREY RAHN REETZ WILL PRODUCE WITNESSES WILLING TO ATTEST TO THE FACT THAT DANIELE HAD ROUTINELY PROCLAIMED THAT SHE WAS GOING TO PUT JEFFREY RAHN REETZ IN PRISON OR KILL HIM, AND ATTEST TO HER MALICIOUS INTENT.

VI CONCLUSION

I JEFFREY RAHN REETZ A 69 YEAR OLD MAN, AM NOT VERY COMPUTER LITERATE, AND HAVE NEVER USED PASSWORD PROTECTION. MY EXWIFE DANIELE WAS VERY COMPUTER LITERATE AND PERPETRATED THIS MOST HEINOUS CRIME UPON ME WITH MALICIOUS INTENT. I HAD NO KNOWLEDGE AT THE TIME WHAT SHE WAS DOING WITH THE COMPUTER AND COULD NOT BELIEVE THAT SHE WOULD DO SUCH A THING. I AM NOT FIRMILARY WITH THE PLAINTIFFS OR ANY OF THEIR IMAGES. I DID NOT KNOWINGLY POSSESS ANY IMAGES OF CHILD PORNOGRAPHY. I RESPECTFULLY REQUEST THE COURT ALLOW MY PRO SE REPRESENTATION AS I CAN NOT AFFORD LEGAL COUNSEL. WITH MY CONVICTION I HAVE LOST EVERYTHING AND AM UNEMPLOYABLE. ALL I HAVE LEFT IS SOCIAL SECURITY AND ALL OF THAT GOES TO FEDERAL RESITUTION PAYMENTS. MY SON SUPPORTS ME AND PAYS FOR MY LIVING EXPENSES. ALTHOUGH I FEEL VERY SYMPATHIC TO THE PLAINTIFFS AS VICTIMS OF THESE CRIMES, HOWEVER I CERTAINLY HAVE DONE NOTHING TO HARM THEM.

RESPECTFULLY SUBMITTED

JEFFREY RAHN REETZ

5618 S. 95TH E. AVE
TULSA, OK 74145

910-302-0091

A handwritten signature in black ink, appearing to read "Jeffrey Rahn Reetz", written in a cursive style.